

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN THE MATTER OF THE SEARCH OF  
One cellular telephone more fully described in  
Attachment A, located at ATF, 1011 Boulder  
Springs Drive, North Chesterfield, VA 23225

Case No. 3:22SW189



**AFFIDAVIT IN SUPPORT OF AN  
APPLICATION UNDER RULE 41 FOR A  
WARRANT TO SEARCH AND SEIZE**

I, J. A. McClendon, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an Application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of property— an electronic device—which is currently in law enforcement possession, and the extraction from that property of electronically stored information described in Attachment B which is incorporated by reference.

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been since January 2017. I am a graduate of the Federal Law Enforcement Training Center (FLETC) and the ATF Special Agent Basic Training Academy. I received specialized training concerning violations of the Gun Control Act within Title 18 and the National Firearms Act within Title 26, of the United States Code pursuant to firearm violations. I am a duly sworn agent who is authorized to carry firearms, execute warrants, and

make arrests for offenses against the United States and to perform such other duties as authorized by law.

3. While employed at ATF, I have been the affiant on several Federal Search Warrants for criminal offenses involving illegal firearms trafficking and narcotics distribution. Furthermore, I have investigated complex cases involving violent crime, organized criminal organizations, illegal firearms trafficking, and narcotics distribution that have resulted in convictions in both federal and state court.

4. I attended the ATF Advanced Investigative Techniques School and received advanced training in the following disciplines: Financial Forensics, Internet Investigations, Social Media Investigations, Reverse Google Geo-Fence Investigations, and Tower Dump Investigations. I have participated in the preparation and execution of numerous arrest and search warrants for criminal offenses involving the possession with the intent to distribute controlled substances and illegal possession of firearms.

5. I am familiar with the methods drug and firearm traffickers use to conduct their illegal activities, to include communication methods, vehicles, text messaging, and narcotics transactions. I received specialized training in narcotics identification, detection, and trafficking, as well as participated in multiple narcotics distribution and firearm interdiction assignments with state and local law enforcement jurisdictions.

6. Based on the facts set forth in this Affidavit, there is probable cause to believe that criminal violations of 18 U.S.C. § 922(o) (possession and transporting of machineguns), 26 U.S.C. §§ 5861(e) and 5861(f), (transferring a firearm in violation of the NFA and making a firearm in violation of the NFA), have been committed, are being committed, and/or will be

committed by Zantias TYLER and others, known and unknown. There is also probable cause to search the device described in Attachment A for evidence, instrumentalities, contraband, or fruits of these crimes as further described in Attachment B.

7. The facts in this Affidavit come from my personal observations, my training and experience, my review of documents, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

#### **IDENTIFICATION OF THE DEVICES TO BE EXAMINED**

8. The property to be searched includes: (1) One Cellular Device: Apple, iPhone, Color: White/Gold, with a cracked front display screen (hereinafter "SUBJECT DEVICE"). This device is currently located at the Bureau of Alcohol, Tobacco, Firearms and Explosives Richmond Field Office, 1011 Boulder Springs Drive Suite 300, North Chesterfield, Virginia, 23225. The applied-for warrant requests authorization to conduct forensic examinations on the SUBJECT DEVICE for the purpose of identifying electronically stored data particularly described in Attachment B.

#### **TECHNICAL TERMS**

9. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. **Wireless telephone:** A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or

traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.

- b. **Digital camera:** A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.
- c. **Portable media player:** A portable media player (or “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video,

or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.

- d. **IP Address:** An Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer connected to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.
- e. **Internet:** The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.
- f. **GPS:** A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some

GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna’s latitude, longitude, and sometimes altitude with a high level of precision.

- g. **PDA:** A personal digital assistant, or PDA, is a handheld electronic device used for storing data (such as names, addresses, appointments or notes) and utilizing computer programs. Some PDAs also function as wireless communication devices and are used to access the Internet and send and receive e-mail. PDAs usually include a memory card or other removable storage media for storing data and a keyboard and/or touch screen for entering data. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can store any digital data. Most PDAs run computer software, giving them many of the same capabilities as personal computers. For example, PDA users can work with word-processing documents, spreadsheets,

and presentations. PDAs may also include global positioning system (“GPS”) technology for determining the location of the device.

10. Based on my training, experience, and research, I know that the SUBJECT DEVICE has capabilities that allow it to: serve as a wireless telephone, digital camera, portable music/media player, connect to the internet, send and receive emails, and/or send and receive text messages. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

### **PROBABLE CAUSE**

11. The United States, including the Bureau of Alcohol, Tobacco, Firearms & Explosives, is conducting a criminal investigation of ZANTIAS TYLER, as well as identified and unidentified subjects, regarding possible violations of 18 U.S.C. § 922(o); 26 U.S.C. §§ 5861(e) and 5861(f).

12. In the month of June 2022, the ATF Internet Investigations Branch (IIB) identified a YouTube channel where the user of the account showcased several videos displaying “auto sears” affixed to pistols, as well as solicited viewers of the channel to purchase 3-D printed “auto sears.” An auto sear is defined as a combination of parts designed and intended for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger- in other words, a *machine gun* as defined in 26 U.S.C. § 5845. This YouTube channel was promoting the manufacture and sale of auto sears specific to “Glock-Style” firearms, commonly referred to as “Switches” or “Glock Switches.”

13. The ATF IIB identified the YouTube channel as “Hood Gunsmith” with URL

(<https://www.youtube.com/channel/UCd7zKnI9x0Iu-wzjQNfTRkQ>). The YouTube channel was open for public view with access to all video uploads, as well to community forum conversations associated with the channel. Review of the channel revealed videos of privately made firearms (PMFs) that claimed to be manufactured by the YouTube channel account user. Also, there were videos of “Glock Switches” that explained how they were created, functioned tested, and compatible with specific “Glock-Style” frames. The ATF IIB observed a screenshot uploaded to the channel’s community forum that displayed the hand of an individual holding a receipt with a partial tracking number displayed.



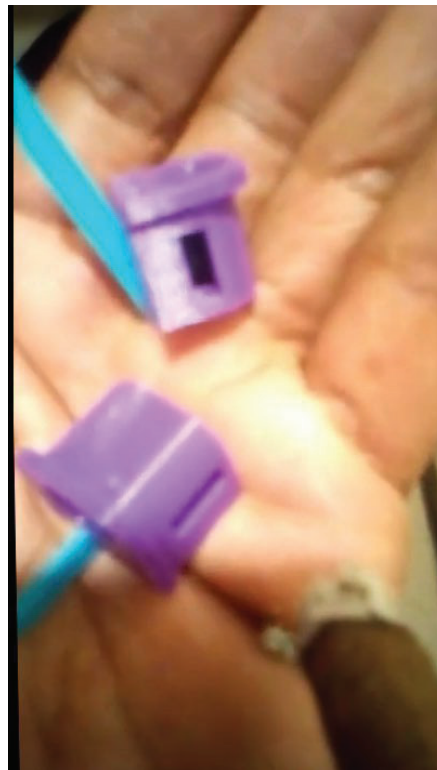
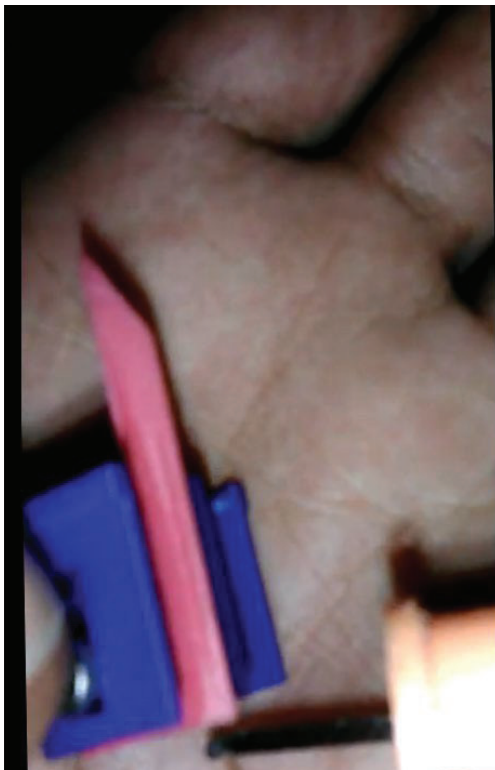
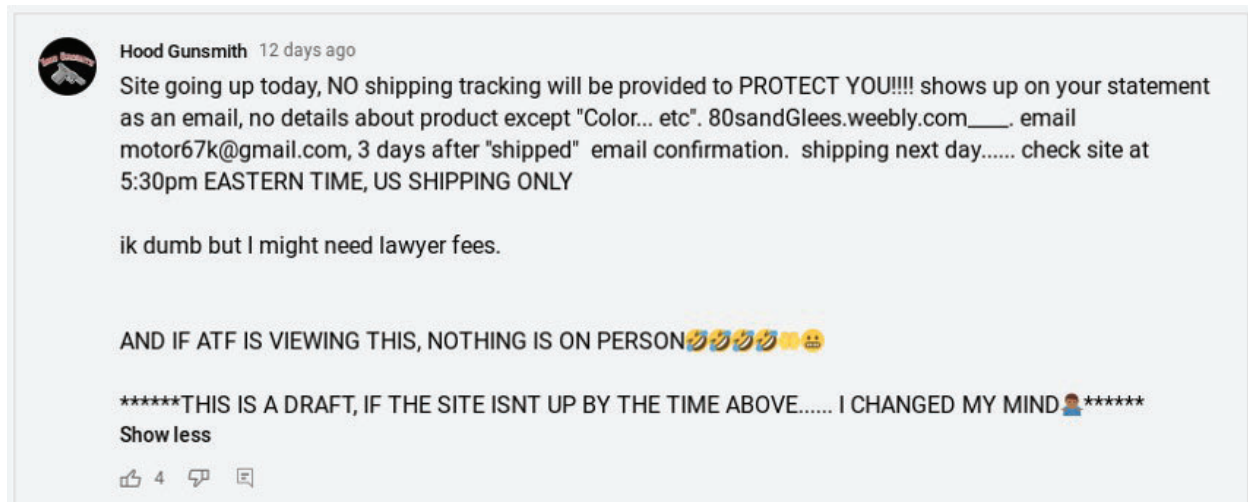
The following is the uploaded photo containing the partial tracking number:



**It was later determined that the receipt was acquired by the individual in the photo on 6/1/2022 at approximately 4:06 p.m.**

14. The ATF IIB requested the assistance of the United States Postal Service (USPS) to aid in a possible identification of the tracking number that could further assist in identifying the channel's account user. The USPS was able to identify the full tracking number, as well as notify ATF that the package(s) were shipped out of Richmond, Virginia. This information was

passed on to the ATF Richmond I Field Office. The following are screenshots captured from the YouTube channel (Hood Gunsmith):





15. ATF Intelligence Research Specialist (IRS) Joshua Pickens identified two Instagram accounts that were associated with the YouTube channel as “dropheat3x” and “hoodgunsmith.” Both accounts had clickable URL links (<https://www.youtube.com/channel/UCd7zKnI9x0Iu-wzjQNfTRkQ>) that directed back to the YouTube channel (Hood Gunsmith). Furthermore, there were photos of PMFs and “Glock Switches” observed on both account pages. Both pages were open for public view, to include all uploaded photos, posts, and followers of the profile.

16. On June 16, 2022, I obtained a federal grand jury subpoena for Google (YouTube) account (<https://www.youtube.com/channel/UCd7zKnI9x0Iu-wzjQNfTRkQ>) and Instagram accounts (“dropheat3x” and “hoodgunsmith”) for business records associated with each account.

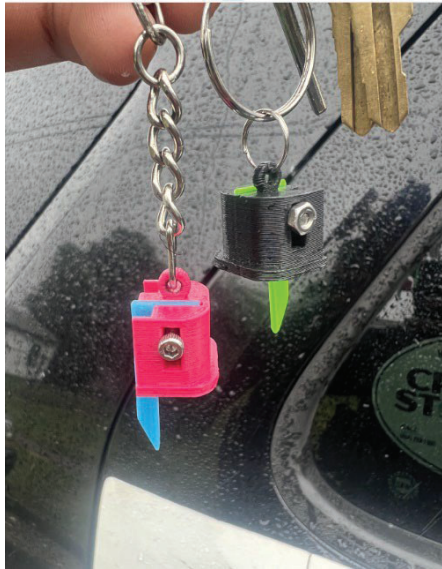
17. On June 17, 2022, after the federal grand jury subpoenas were served, Google (YouTube) provided the requested data. The subscriber information indicated the YouTube account was associated with a Zantias TYLER. Furthermore, there was a telephone number associated with the account that was identified as (804) 252-1098.

18. IRS Pickens queried “Zantias Tyler” in the Law Enforcement Information Exchange (LINX) that revealed the following identifiers:

- **Zantias O’Neal Tyler; DOB (XX/XX/1995)**
- **2127 Phaup Street Richmond, Virginia 23223**

Further review of LINX showed that TYLER was listed as an offender in a weapons law violation in Richmond, Virginia that occurred on May 25, 2022. Richmond Police Officers made contact with TYLER in the 2100 block of Phaup Street. Officers observed what appeared to be a firearm protruding from his right pants pocket. Further investigation of the firearm revealed that there were no manufacturing markings (i.e., make, model, serial number, etc.) located on the weapon. TYLER explained to the officers that he built the weapon and that it was a “Ghost Gun.” Privately made firearms are sometimes referenced to as “Ghost Guns” because they lack manufacturing markings that would assist in tracing a weapon to its last documented owner. During the encounter with police, TYLER dropped a set of keys on ground. Police noticed what appeared to be two plastic “Glock Switches” affixed to TYLER’S key chain. The

following is a photo of the “Glock Switches” observed on TYLER’s key chain:



TYLER advised police that the objects on the keychain were not “Glock Switches” and that he purchased said items from a 3-D printing website. TYLER acknowledged that he knew what an “auto sear” was and that the auto sear would make a weapon fire automatic. TYLER then provided police with telephone number (804) 252-1098. RPD took custody of the “Glock Switches” and later transferred into ATF custody. The ATF Firearms Technology Branch has now given a written determination that the items recovered from TYLER are designed and intended for use in converting a Glock pistol into a machinegun.

19. The USPS Postal Inspection Service provided ATF with USPS Business Records pursuant to packages delivered to TYLER’s address. USPS Business records indicated a parcel was delivered on June 9, 2022, to “ROD ROD,” with a return address of “REXROI.COM,” 810 S Broadway, 305A, Los Angeles, CA 90014. USPS Business records indicated a parcel was delivered on May 24, 2022, to “ROD ROD,” with a return address of “REXROI.COM” 810 S



Broadway, 305A, Los Angeles, CA 90014. USPS Business records indicated a parcel was delivered on April 29, 2022, to “ROD ROD,” with a return address of “REXROI.COM,” 810 S Broadway, 305A, Los Angeles, CA 90014. “REXROI.COM” was identified as a website that allows customers to upload files for 3-D printing.

20. The USPS Postal Inspection Service provided surveillance video of TYLER shipping two packages on June 1, 2022, from a U.S. Post Office, located at 414 N. 25<sup>th</sup> Street Richmond, VA 23223. The surveillance video captured the interior lobby of the post office. The date and time were consistent with the uploaded U.S. Postal receipt to YouTube and when TYLER was observed shipping packages from the post office. Furthermore, the surveillance video showed TYLER in possession of a cellular device while inside the post office. A review of TYLER’s DMV photograph, as well as body-cam footage from his encounter with Richmond police on May 25, 2022, confirms that the person in this video is TYLER. The following is a photograph captured of TYLER while inside the post office:



21. The telephone number that TYLER provided police [(804) 252-1098] was identified as a T-Mobile wireless number and was queried through TLOxp in an attempt to identify any individual(s) associated with the telephone number. The results indicated that Marquetta Tyler (B/F, DOB: XX/XX/1968) of 2127 Phaup Street Richmond, VA (the PEMISES), was associated with the number.

22. On June 17, 2022, YouTube profile (Hood Gunsmith) uploaded a video advising that he was restocked with "Glock Switches." The video depicted what appeared to be an individual's hand possessing several "Glock Switches" contained within a plastic bag.

The following are photographs captured from the video:



A link to the YouTube account user's online store [80sandglees.weebly.com] was uploaded to the channel. The online store allowed for the purchase of several different "Glock Switch" models and contained the following:

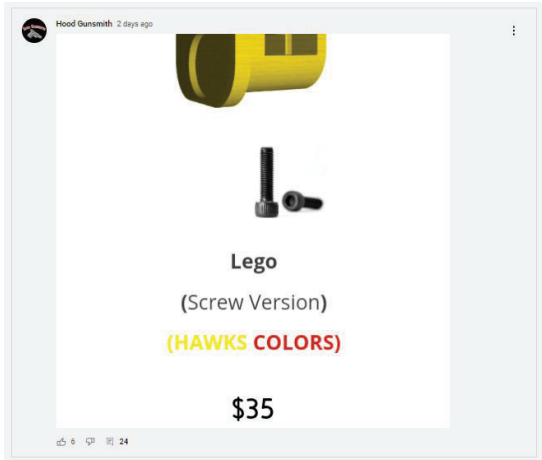


Orders ship on Mondays only. **EVERYTHING SHIPS June 27th (waiting for screws). Next metal order deadline is July 4.**

Email Order Status updates on every order.

Inventory count is not live, but is updated as orders come periodically. In the case of over selling / purchasing you WILL BE ISSUED A REFUND WITHIN 24HRS TO THE METHOD USED TO FUND YOUR PURCHASE.





Lego  
(Screw Version)  
(Light Blue And Green)

\$35

**It was determined that the mode of payment for said items was through the financial technology company, PayPal.**

23. On June 21, 2022, YouTube profile (Hood Gunsmith) uploaded a photograph to the comments section advising that he created a PMF. The photograph depicted what appeared to be an individual's hand possessing a "Glock Style" pistol with an extended magazine. The following are photographs captured from the post:

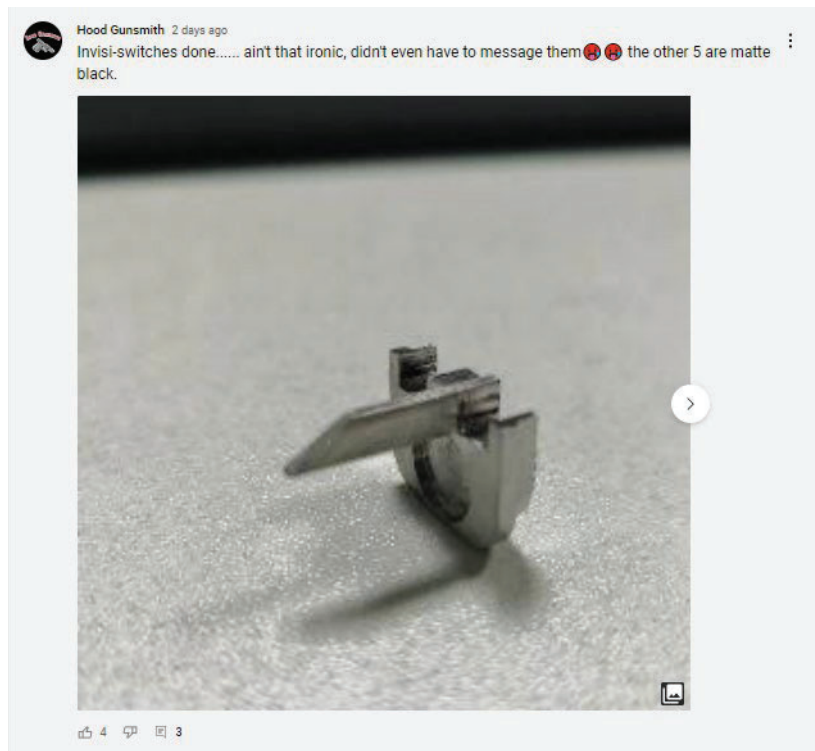


Hood Gunsmith 3 days ago

19 finished, did not come out clean..... mf jig was off on left m4 hole, had to redrill TWICE with my first jig (same one I used to fix my G23 m3 hole) also the front locking block pin hole got stretched trying HAND push the front pin in at this point I'm literally done with these

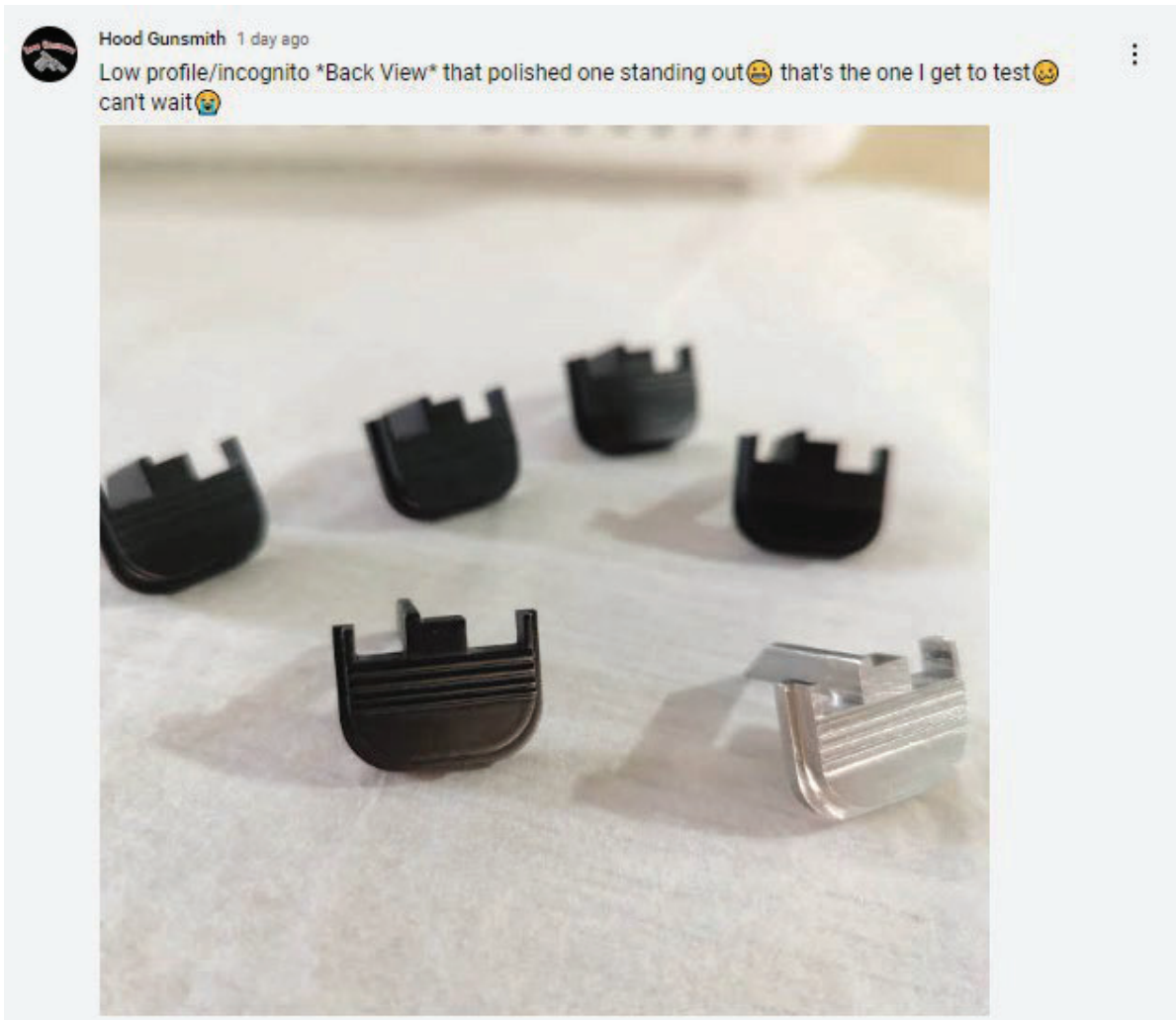


24. On June 22, 2022, YouTube profile (Hood Gunsmith) uploaded a photograph to the comments section depicting an “Invisi-Switch.” (“Invisi-Switches” are auto sears that are further concealed into the design of the firearm making it more difficult to detect.) The following is a photograph captured from the post:



25. On June 22, 2022, YouTube profile (Hood Gunsmith) uploaded two posts in the comments section advising that the prices of the “Invisi-Switches” were increasing. Furthermore, YouTube profile (Hood Gunsmith) uploaded a photograph to the comments displaying six “Invisi- Switches.” There was a following-up post from YouTube profile (Hood Gunsmith) that stated, “you see anyone using my invis i pics please report them..... I’m the only one with these photos (my design and I was sent pics directly from the manufacturer)..... It feels good to own/create something [emoji]”. The following was a screenshot captured of the posts:





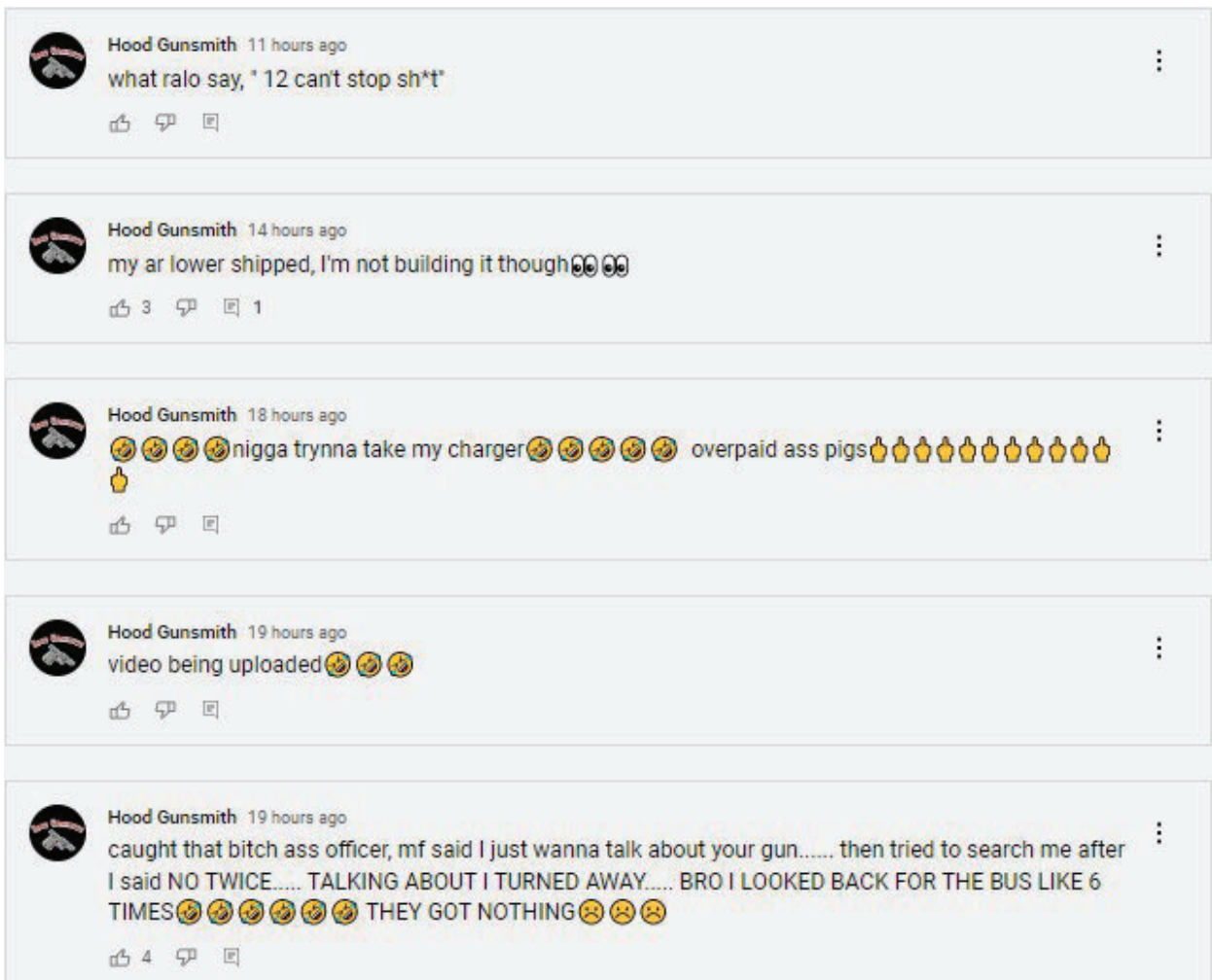
26. On June 23, 2022, ATF agents conducted surveillance of TYLER's residence. Agents were dressed in plain clothes and in unmarked vehicles during the surveillance. At approximately 1:58 p.m., agents observed TYLER leave his residence on foot. TYLER was wearing a blue hooded sweatshirt and khaki-colored pants. At approximately 2:24 p.m., agents observed TYLER return and enter his residence. The following is a photo that captured TYLER right before he entered his residence:



27. At approximately 4:23 p.m., agents observed TYLER exit his residence. TYLER was wearing the same clothing as observed by agents earlier in the afternoon. Officers with the Richmond Police Department (RPD) made contact with TYLER less than a block away from his house. RPD officers conversed with TYLER about a firearm that was seized by RPD on May 25, 2022. Furthermore, RPD officers conducted a frisk of TYLER's person after TYLER continuously bladed the right side of his body away from officers. Police did not recover any firearms from TYLER. TYLER then got onto a city bus and left the area. ATF concluded the surveillance after losing sight of TYLER in the 400 block of N 28<sup>th</sup> Street Richmond, VA.

28. On June 23, 2022, YouTube profile (Hood Gunsmith) uploaded posts to the comments section in reference to the encounter with RPD and TYLER. The following was a screenshot captured of the posts:





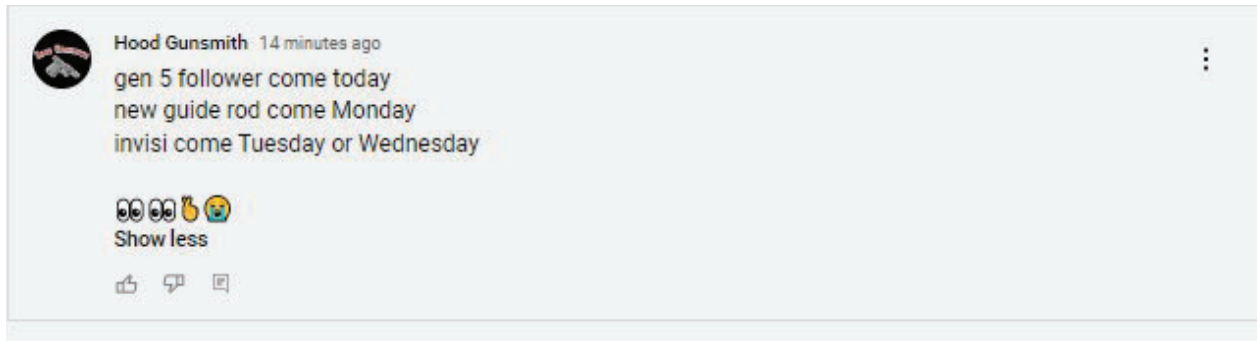
29. On June 23, 2022, YouTube profile (Hood Gunsmith) uploaded a video to the comments section in reference to the encounter with RPD and TYLER. [The RPD officer is heard making mention to TYLER by name in the video.] The following was a screenshot captured of the video:



30. On June 24, 2022, USPS Postal Inspection Service provided ATF with USPS Business Records pursuant to packages expected to be delivered to TYLER's residence. USPS Business records indicated a parcel is expected to be delivered on June 27, 2022, to "ZAN TYLER," with a return address of "HGW" PO Box 2390, Tualatin, OR 97062. USPS Business records indicated a second parcel is expected to be delivered on June 27, 2022, to "ZAN TYLER," with a return address of "NIMRODSWARES.COM" PO Box 390610, Anza, CA 92539 on June 27, 2022.

31. On June 24, 2022, YouTube profile (Hood Gunsmith) uploaded a post to the comments section in reference to "Invisi-Switches" and other gun parts that were due to be delivered. The following was a screenshot captured of the posts:





32. On June 27, 2022, ATF agents executed a Federal Search Warrant (3:22SW115) at 2127 Phaup Street Richmond, VA 23223. Agents made contact with TYLER, and two other family members, at the front door of the residence. The following items were recovered after the execution of the search warrant:

- Black UMX cellular telephone; further described as ATF Evidentiary Item #006.
- Blue WIKO cellular telephone; further described as ATF Evidentiary Item #007.
- Brown, Polymer 80 pistol with magazine; further described as ATF Evidentiary Item #008.
- Polymer 80 kits and accessories; further described as ATF Evidentiary Item #009.
- Switches; aka: "Glock Style"; further described as ATF Evidentiary Item #010.
- Cellular telephone; further described as ATF Evidentiary Item #011.
- Plastic baggies; further described as ATF Evidentiary Item #012.
- Manufacturing tools; further described as ATF Evidentiary Item #013.
- Dremel kits; further described as ATF Evidentiary Item #014.
- Financial Banking Cards; further described as ATF Evidentiary Item #015.

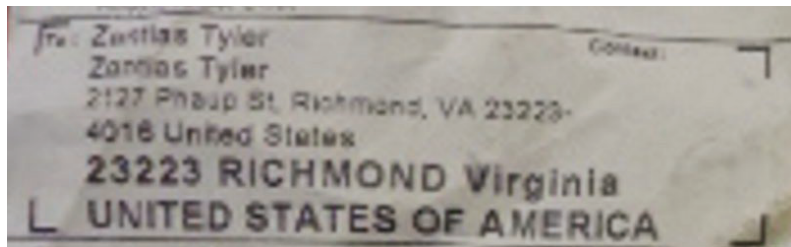
The ATF Firearms Technology Branch has now given a written determination that the switch (ATF Evidentiary Item #010) recovered from TYLER's residence is designed and intended for use in converting a Glock pistol into a machinegun.

33. TYLER elected to speak with law enforcement at the U.S. Postal Inspection Service office located in Richmond, VA. TYLER was advised *Miranda* warning and agreed to speak to law enforcement. TYLER told agents that he possessed auto sears but did not sell them. TYLER acknowledged that he knew what auto sears were and that

possessing them was a federal offense. TYLER was unable to provide agents with the name of the online 3-D printing company where he acquired the auto sears and was not forthcoming with additional information about his involvement with the distribution of auto sears. TYLER provided agents with a contact number of (804) 252-1098 before requesting to terminate the interview.

34. On June 27, 2022, Department of Homeland Security (DHS) Homeland Security Investigations (HSI) investigators identified an international parcel from China for shipment addressed to TYLER at his address. Six metal auto sears were recovered from the package and then seized by HSI. The ATF Firearms Technology Branch has now given a written determination that all (6) six auto sears recovered from the international parcel is designed and intended for use in converting a Glock pistol into a machine gun. The following are photographs of the package and its contents:





**The auto sears recovered by HSI appear to have the same physical characteristics as the auto sears uploaded by TYLER to his YouTube channel (Hood Gunsmith) on June 22, 2022.**

35. On June 27, 2022, ATF Senior Forensic Auditor Keith Cobb received business records and subscriber information from PayPal Holdings, Inc. pursuant to a Federal Grand Jury Subpoena issued by the United States District Court Eastern District of Virginia. PayPal provided the requested business records for the following:

- Zantias Tyler
- DOB: XX/XX/1995
- Address: 2127 Phaup Street, Richmond VA 23223

- Email Addresses: Identified email addresses
- Telephone Number: (804) 252-1098

There were (11) eleven PayPal accounts identified that were associated with TYLER.

Furthermore, each account included the registered name, email address(s), business information, account information, social security number, address, bank account(s), credit card(s), and transactional records linked to the account.

36. ATF IRS Pickens analyzed PayPal account number *2251714234645967105*.

This was one of the eleven accounts associated with TYLER. The account was in an “Open Status” and was registered to Zantias TYLER, with TYLER’s date of birth and social security number linked to the account. TYLER’s address and telephone number (804- 252-1098) were registered to the account. [Ghosttheboy@gmail.com](mailto:Ghosttheboy@gmail.com), was listed as a registered email to the account. Lastly, an active PayPal debit card (XXXXXXXXXXXX9947) was registered to the account. It is important to note that there was a PayPal debit card with the same account number seized by federal agents after executing a Federal Search Warrant at TYLER’s residence on June 27, 2022.

37. ATF IRS Pickens analyzed the transaction log, specifically the “Payments Received,” for PayPal account number *2251714234645967105*. There were multiple transactions observed where payments were made to the account from multiple email addresses. Further analysis of the PayPal payments received, compared with exact prices advertised on the online store [80sandglees.weebly.com] for “Glock Switches.” This was the same store linked to TYLER’s YouTube page [(Hood Gunsmith) (<https://www.youtube.com/channel/UCd7zKnI9x0Iu-wzjQNfTRkQ>)]. For example, there were multiple \$35.00 PayPal payments received to the account. The online store advertised (6) six different “Glock Switches” for \$35.00 each. This is true for other PayPal payments

received to the account for more expensive “Glock Switches” advertised for sale on the online store (i.e., \$215.00 PayPal payment received to the account and a metal “Glock Switch” advertised online for \$215.00). There were more than (17) seventeen “Completed” PayPal payments made to the account between May 27, 2022, and June 21, 2022, that corresponded with the prices for “Glock Switches” for sale on the online store.

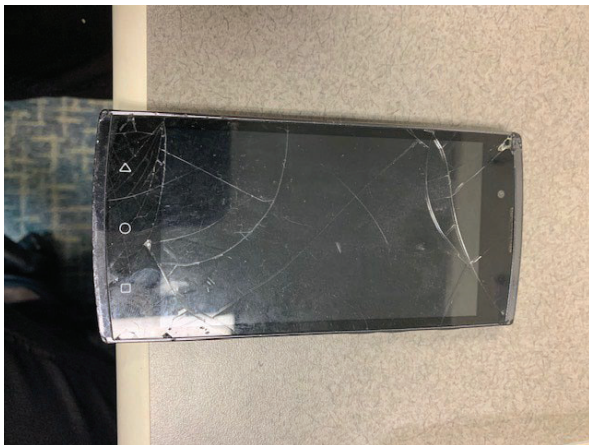
38. ATF IRS Pickens requested the assistance of the USPIS in reviewing shipping information for addresses identified as making payment to the PayPal account (2251714234645967105) for suspected “Glock Switches.” The USPIS cross referenced the records and discovered a United States Postal Service parcel bearing the tracking number, **9500114787672157156325**, addressed to “BRYANT J.,” 434 New Castle Lane, Springlake, NC 28390, United States with a return address of “Shipping Dept” 700 Heritage Lane, Bel Air, MD 21014. The parcel was subsequently marked as “Return to Sender” (RTS). Based on previous shipments by TYLER, utilizing the East End Post Office located at 414 N 25th Street Richmond, Virginia 23223, each parcel displayed a return address of “Shipping Dept” 700 Heritage Lane, Bel Air, MD 21014. A check of the RTS address revealed that it was not a valid address for delivery. The USPIS contacted the Bel Air Post Office located at 202 Blum Court, Bel Air, Maryland, 21014 and requested the parcel be sent to the USPIS Richmond Domicile Office. On July 6, 2022, the parcel was scanned as seized by law enforcement and placed into the USPIS evidence vault. USPIS investigators obtained surveillance video of TYLER at the East End Post Office shipping the parcel, bearing the tracking number **9500114787672157156325**, and 8 additional parcels on June 6, 2022. All 9 parcels contained the return address of “Shipping Dept” 700 Heritage Lane, Bel Air, MD 21014.

39. On July 6, 2022, ATF SA Herndon and I made contact with TYLER on the

front porch of his residence. I advised TYLER that ATF did not have any warrants for his arrest and that we had photographs of some property that was taken from his residence, pursuant to a federal search warrant, that we can possibly return to the rightful owner. The following photographs were shown to TYLER:

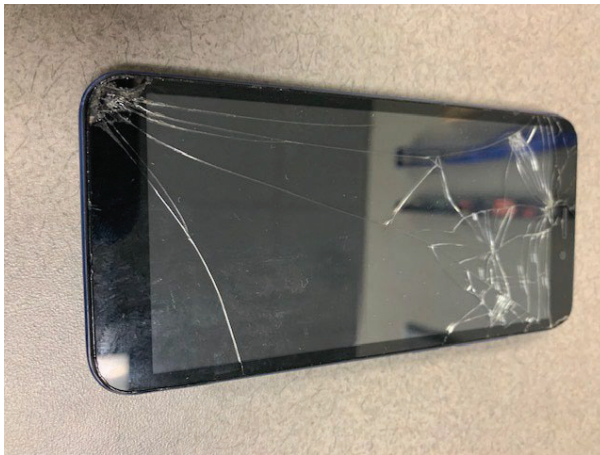


**(ATF Evidentiary Item #011, SW Item #06)**



**(ATF Evidentiary Item #006, SW Item #01)**



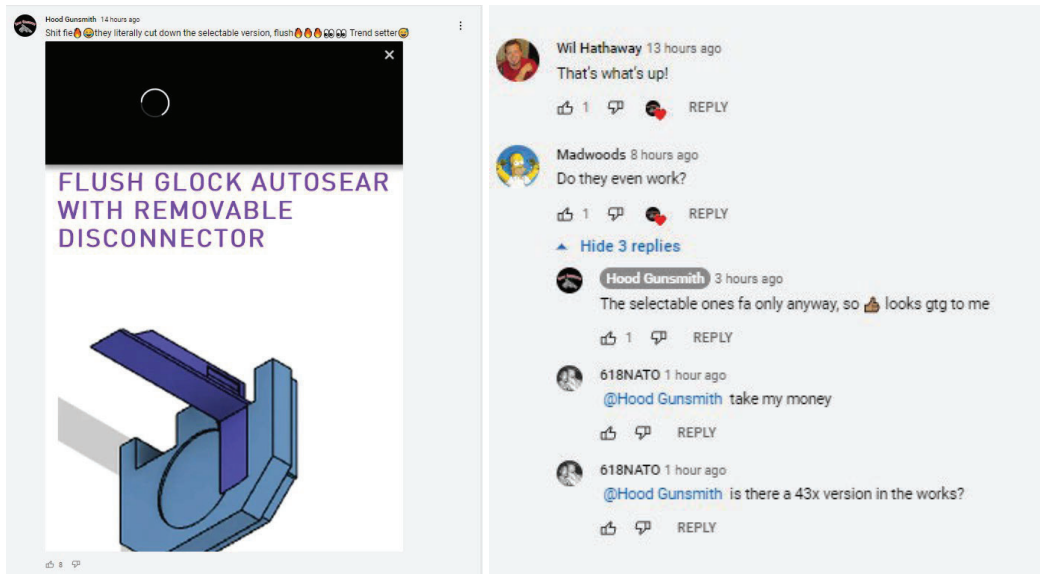


**(ATF Evidentiary Item #007, SW Item #02.)**

TYLER claimed ownership of ATF Evidentiary Item #07, even though he advised that the phones were not registered in his name. Furthermore, TYLER provided the telephone number to the claimed cell phone as (804) 252-1098.

40. On July 12, 2022, ATF agents executed a Federal Search Warrant (3:22SW127) on TYLER's cell phone (ATF Evidentiary Item #07). Custody of the cell phone was transferred to Virginia State Police and are awaiting further cell phone analysis.

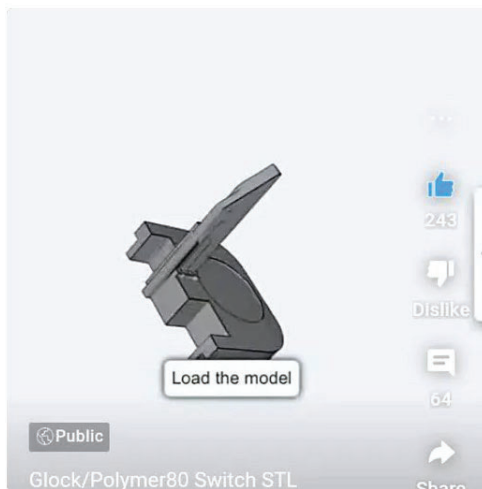
41. On July 12, 2022, YouTube profile (Hood Gunsmith) uploaded the following to the page:



42. On July 12, 2022, I reviewed a profile associated with a Cults3D website ([STL file Invisi-switch Beta • Design to download and 3D print • Cults \(cults3d.com\)](#)) selling a download to manufacture a 3-D printed auto sear. Further review of the website revealed that there were two active hyperlinks that directed website viewers to either YouTube Profile “Hood Gunsmith” or Weebly online store (<https://www.80sandglees.weebly.com/>). Furthermore, review of the photos associated with the Cults3D website showed “Glock Switches” with the same physical characteristics as those advertised for sale/distribution by TYLER on his YouTube account “Hood Gunsmith.” Also, the photos appear to be the same photos uploaded by TYLER to his YouTube account on 6/22/2022, and consistent with package contents that were seized by DHS on 6/27/2022, destined for TYLER’s residence. Below are screen captures of the website:



INVISI-SWITCH BETA



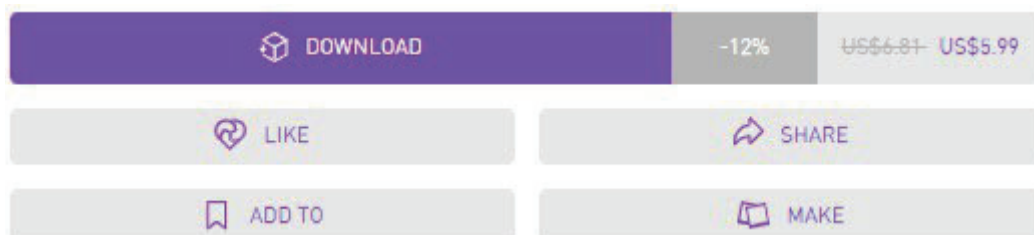
INVISI-SWITCH BETA



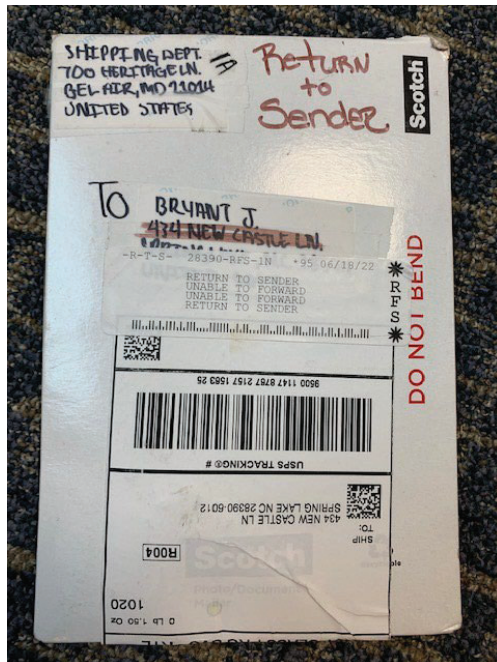
INVISI-SWITCH BETA



INVISI-SWITCH BETA



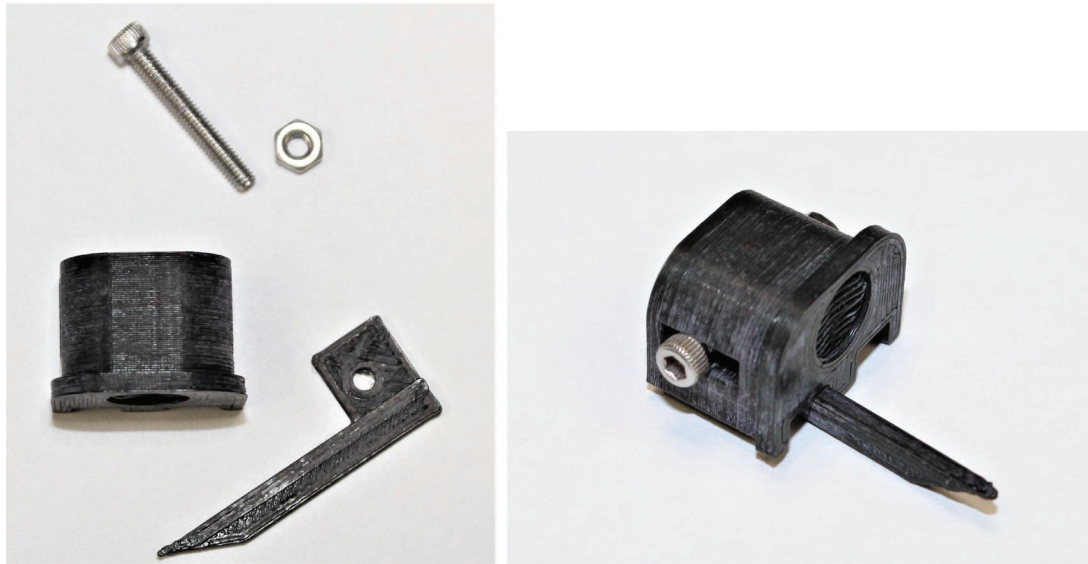
43. On July 22, 2022, I made contact with USPIS Inspector Stefan Hinds and took custody of the RTS parcel that was shipped by TYLER on June 6, 2022:



I administratively processed the parcel into ATF property as ATF Evidentiary Item 020.

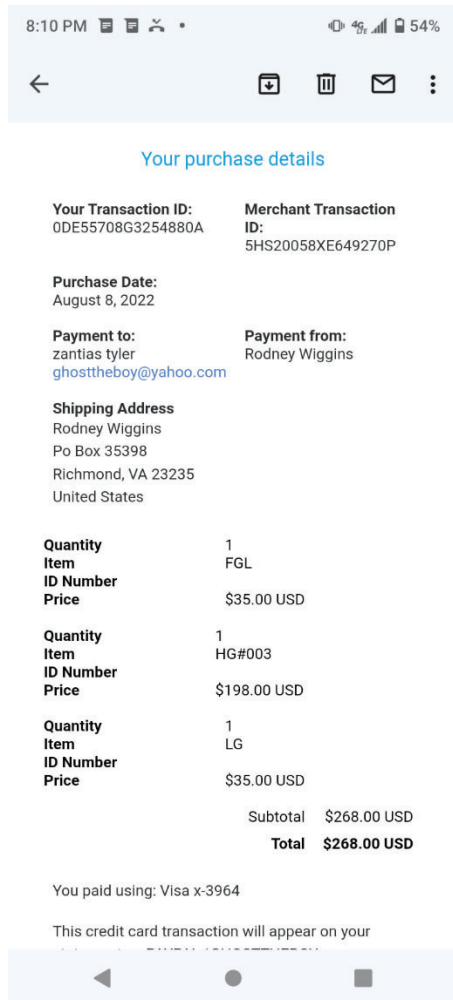
44. On August 11, 2022, ATF agents executed a Federal Search Warrant (3:22SW151) on the RTS parcel (ATF Evidentiary Item 020). Agents located a small plastic baggie that contained what appeared to be a Glock Switch. The following was recovered from the parcel:





The ATF Firearms Technology Branch has now given a written determination that the switch recovered from the RTS parcel is designed and intended for use in converting a Glock pistol into a machinegun.

45. On August 8, 2022, the ATF utilized an undercover (UC) account, credit card, and delivery location to purchase (3) three “Glock Switches” [Two 3D Printed Style Switches and one metal Invisi-switch] from <http://80sandglees.weebly.com/>, an online store associated with TYLER. The following is a snapshot of the receipt for the purchase:



**It is important to note that the receipt showed payment made to Zantias TYLER with associated email address listed as ghosttheboy@yahoo.com.**

46. On August 21, 2022, I received updated business records and subscriber information from PayPal Holdings, Inc. pursuant to a Federal Grand Jury Subpoena issued by the United States District Court Eastern District of Virginia. PayPal provided the requested business records for the following:

- Zantias Tyler
- DOB: XX/XX/1995
- Address: 2127 Phaup Street, Richmond VA 23223
- Email Addresses: Identified email addresses

- Telephone Number: (804) 252-1098

There were (11) eleven PayPal accounts identified that were associated with TYLER.

This is the same number of accounts associated with TYLER previously received from PayPal. Furthermore, each account included the registered name, email address(s), business information, account information, social security number, address, bank account(s), credit card(s), and transactional records linked to the account.

47. I analyzed PayPal account number 2251714234645967105. This was one of the eleven accounts associated with TYLER. The account was in an “Open Status” and was registered to TYLER, with TYLER’s date of birth and social security number linked to the account. TYLER’s address and telephone number (804-664-8902) were registered to the account. This telephone number has since been updated from the previous telephone number registered to the account that was identified as (804-252-1098). [Ghosttheboy@gmail.com](mailto:Ghosttheboy@gmail.com), was listed as a registered email to the account. Lastly, an active PayPal debit card (XXXXXXXXXXXX3203) was registered to the account. This has since been updated from the original card that was registered to the account that was identified as (XXXXXXXXXXXX9947).

48. I analyzed the transaction log, specifically the “Payments Received,” for PayPal account number 2251714234645967105. There were (9) nine “Completed” transactions observed where PayPal payments were made to the account from multiple email addresses between July 6, 2022, and August 13, 2022, that corresponded with the prices for “Glock Switches” for sale on TYLER’s online store. Further review of the “Payments Received” showed PayPal Transaction ID 5HS20058XE649270P (ATF UC Purchase) as a “Completed” transaction.



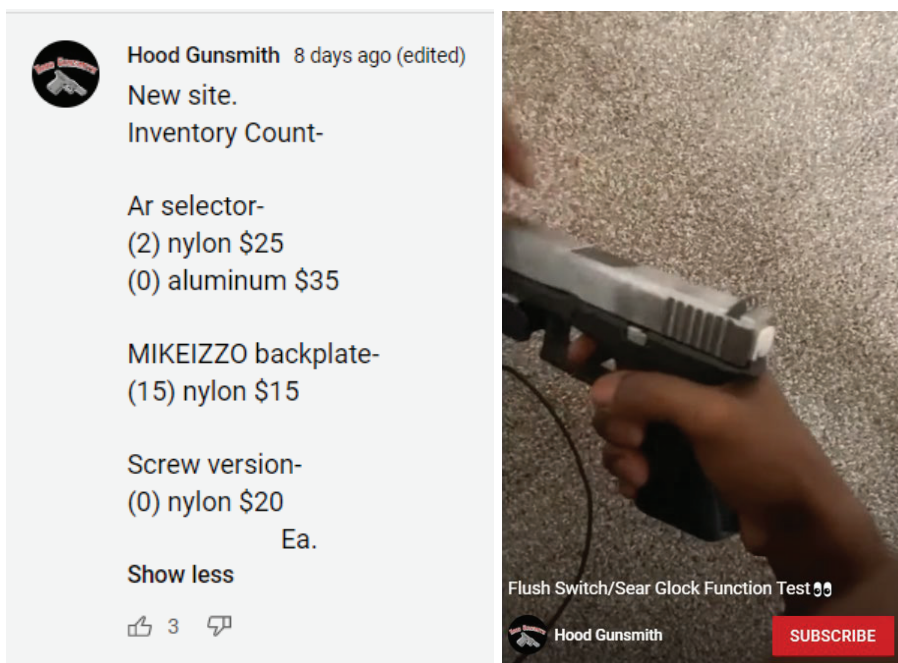
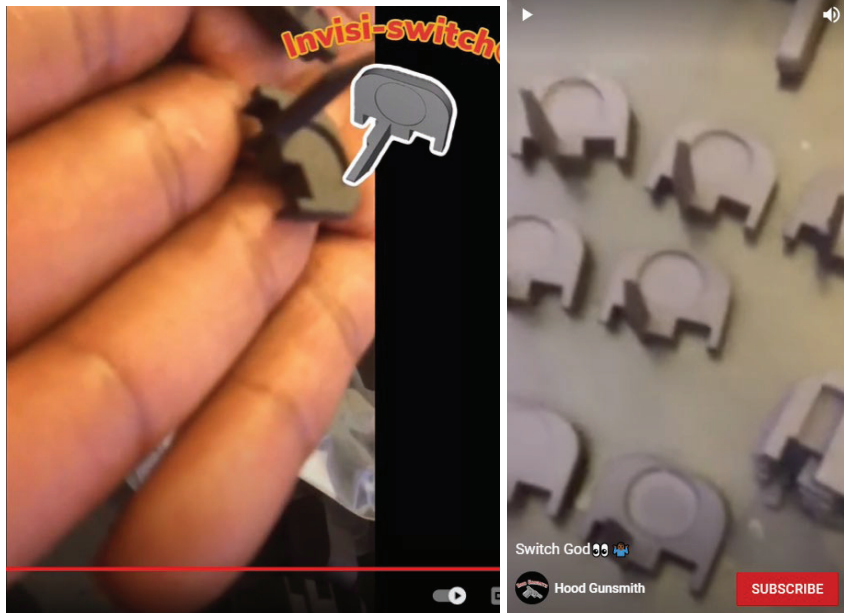
49. On August 25, 2022, I analyzed the transaction log, specifically the “Payments Sent,” for PayPal account number 2251714234645967105. Further review of the transactions where payments were sent to “Cults” and “Cults3D” revealed the following:

- **7/12/2022** – A mobile express checkout payment was sent to “Cults3D” in the amount of \$4.74 with Transaction ID 01H38498BJ172210C. The subject of the transaction was labeled “GLOCK 42, 43, 48 fully auto sear back plate” with a shipping address of “zantias tyler; 2127 Phaup Street Richmond, VA”.
- **7/27/2022** – A mobile express checkout payment was sent to “Cults” in the amount of \$8.00 with Transaction ID 885520111S052052N. The subject of the transaction was labeled “Flush Glock Autosear with removable Disconnecter” with a shipping address of “zantias tyler; 2127 Phaup Street Richmond, VA”.

50. The photograph that was uploaded to “Hood Gunsmith,” depicting “Flush Glock Autosear with removable Disconnecter” approximately two months prior, is consistent with the data shown on TYLER’s PayPal account on July 27, 2022, showing a payment made to “Cults” for a “Flush Glock Autosear with removable Disconnecter.”

51. ATF continued to surveil TYLER’s YouTube page (Hood Gunsmith) and observed several videos that were uploaded during the week of September 19, 2022, where several Glock Switches are being displayed and advertised for sale. The following are screenshots from videos uploaded to TYLER’s YouTube profile (Hood Gunsmith). It is important to note that the Glock Switches in the videos are consistent with what was seized either from TYLER’s person by police, from TYLER’s residence after executing the Federal Search Warrant, or from a parcel shipped by TYLER.

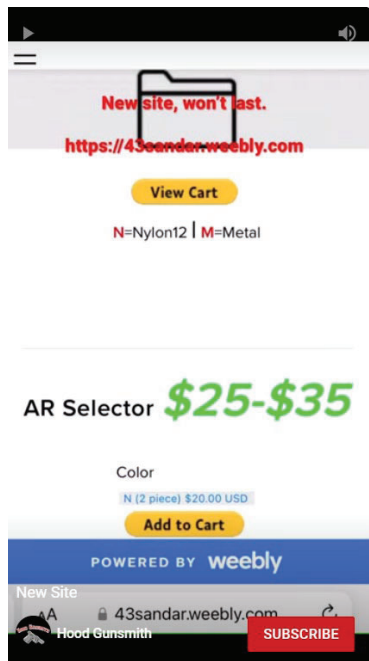




52. On September 26, 2022, a new online store associated with TYLER was identified as <https://43sandar.weebly.com>. TYLER was advertising his new website in the comments section of his YouTube profile. TYLER's previous online store,



<https://80sandglees.weebly.com>, appears no longer be active. The following is a screenshot of the new online store associated with TYLER:



53. On October 6, 2022, ATF agents executed a Federal Search Warrant (3:22SW171) and Federal Arrest Warrant (3:22-CR-145) at 2127 Phaup Street Richmond, VA 23223. Agents made contact with TYLER, and two other family members, at the front door of the residence. TYLER was subsequently taken into federal custody. The following items were recovered after the execution of the search warrant:

- Firearm parts and accessories: pistol receiver, 80%, and barrel ATF Evidentiary Item #029.
- (2) Two boxes of assorted screws and nuts ATF Evidentiary Item #030.
- Small plastic baggie containing (1) one screw ATF Evidentiary Item #031.
- (1) PayPal Debit Card ATF Evidentiary Item #032.
- (3) Three Bank of America Debit Cards ATF Evidentiary Item #033.
- (1) One box of screws and nuts; AND (2) Two metal pieces that appeared to be firearm parts ATF Evidentiary Item #034.
- (1) One Gold Apple iPhone ATF Evidentiary Item #035 (**SUBJECT DEVICE**).  
[It is important to note that TYLER claimed ownership of the SUBJECT DEVICE.]

- Shipping receipt addressed to Tyler from Hooper Gun Works ATF Evidentiary Item #036.
- (2) Two plastics baggies containing what appeared to be Glock Switches ATF Evidentiary Item #037.
- Plastic baggie containing firearm parts ATF Evidentiary Item #038.
- Envelopes/Packaging ATF Evidentiary Item #039.
- Shipping receipt addressed to Tyler from US Patriot Armory ATF Evidentiary Item #040.
- Unknown metal tool ATF Evidentiary Item #041.

54. On October 11, 2022, I received updated business records and subscriber information from PayPal Holdings, Inc. pursuant to a Federal Grand Jury Subpoena issued by the United States District Court Eastern District of Virginia. The updated request was made after observing TYLER advertising a new online store, as well as observing continued completed PayPal transactions consistent with the sale of advertised Glock Switches after agents served TYLER with a target letter on July 6, 2022.

55. Eleven PayPal accounts were identified that were associated with TYLER. These were the same PayPal accounts previously identified as being associated with TYLER. I analyzed the transaction log, specifically the “Payments Received,” for PayPal account number 2251714234645967105. There were (14) fourteen “Completed” transactions observed where PayPal payments were made to the account from multiple email addresses between September 22, 2022, and September 28, 2022, that corresponded with the prices for sale on TYLER’s online store.

56. I reviewed TYLER’s criminal history and observed no criminal convictions.

57. In my training and experience, I know that the SUBJECT DEVICE has been stored in a manner in which its contents are, to the extent material to this investigation, in substantially the same state as when the SUBJECT DEVICE first came into ATF’s possession on October 6, 2022.

58. I am aware, based on my training and experience, that the SUBJECT DEVICE is an iPhone, and with that, carries the capabilities of a computer. I am also aware that the SUBJECT DEVICE can run several applications, to include banking and social media platforms (i.e., YouTube, Instagram, etc.) making it convenient for its user to have access to said applications at any given time and/or place. I am aware that firearms traffickers utilize iPhones and/or smartphones to gain access to its available applications to sell illegal firearms and to collect profits from illicit sales.

59. I am also aware, based on my training and experience, that firearms traffickers often utilize their cellular telephone to take photographs and videos of their firearms; take photographs and videos of themselves while in possession of, or brandishing firearms; and will use their cellular telephone to store photographs of firearms that they recently acquired, manufactured, or have an interest in purchasing. Sometimes, the photograph of the firearm will also include the sale price for the firearm. I am also aware that people will often send a photograph or video of a firearm to an individual's cellular telephone so that the photograph or video can be posted on social media.

60. Photographs and videos of firearms that are uploaded to social media are also often present in photographs and videos on the cellular telephones of the individual who possessed, solicited, bought, or manufactured the firearm. Sometimes the photograph is taken to show other people a picture of the firearm that was recently acquired. At other times, pictures of firearms are taken to show a firearm that is for sale; and sometimes photographs of firearms on cellular telephones are sent to others to show the kind of firearm that the individual is hoping to acquire. Individuals also send photographs and videos of firearms taken from their cellular telephone to friends or others as a means of bragging about the firearm they acquired or

possessed, or they are on the cellular telephone prior to posting the video or photograph on social media.

61. Based on the foregoing, your affiant submits that there is probable cause to believe that a search of the SUBJECT DEVICE will reveal videos and photographs of transferring and manufacturing unregistered firearms, in violation of 18 U.S.C. § 922(o), 26 U.S.C. §§ 5861(e) and 5861(f).

### **ELECTRONIC STORAGE AND FORENSIC ANALYSIS**

62. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on electronic devices. This information can sometimes be recovered with forensics tools.

63. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the firearm crime as described herein, but also may provide forensic evidence that establishes how the SUBJECT DEVICE was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be found on the SUBJECT DEVICE because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).
- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.

- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on storage medium that are necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

64. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the SUBJECT DEVICE consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the SUBJECT DEVICE to human inspection in order to determine whether it is evidence described by the warrant.

65. *Manner of execution.* Because this warrant seeks only permission to examine the SUBJECT DEVICE that is already in law enforcement's possession, the execution of this

warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

**SPECIFICITY OF SEARCH WARRANT RETURN AND NOTICE  
REGARDING INITIATION OF FORENSIC EXAMINATION**

66. Consistent with the Court's current policy, the search warrant return will list the model and/or serial number of the SUBJECT DEVICE.

**CONCLUSION**

67. I submit that this affidavit supports probable cause for a search warrant authorizing the examination of the SUBJECT DEVICE described in Attachment A to seek the items described in Attachment B.

Respectfully submitted,




JASON MCCLENDON  
2022.11.01 21:26:01 -04'00'

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J. A. McClendon  
Special Agent, ATF

Subscribed and sworn to before me on the 2nd day of November, 2022  
Richmond, Virginia

/s/   
Mark R. Colombell  
United States Magistrate Judge

**ATTACHMENT A**

1. The property to be searched is: (1) One Cellular Device: Apple, iPhone, Color: White/Gold, with a cracked front display screen. This device is currently located at the Bureau of Alcohol, Tobacco, Firearms and Explosives Richmond Field Office, 1011 Boulder Springs Drive Suite 300, North Chesterfield, Virginia, 23225.

2. This warrant authorizes the forensic examination of the SUBJECT DEVICE for the purpose of identifying the electronically stored information described in Attachment B, which is incorporated by reference.

**ATTACHMENT B**

1. All records on the SUBJECT DEVICE described in Attachment A that relate to possessing and transporting machine guns, in violation of 18 U.S.C. § 922(o), and transferring and manufacturing unregistered firearms, in violation of 26 U.S.C. §§ 5861(e) and 5861(f), involving Zantias TYLER including:

- a. Photographs of the recovered firearms on the SUBJECT DEVICE.
- b. Notes, ledgers, messages, and similar records relating to the possessing, ordering, purchasing, and selling of firearms.
- c. Address books, phone books, applications (“Apps”), and similar records reflecting names, addresses, telephone numbers and other contact or identification data involving firearms sales and acquisition.
- d. Calendars, applications, and other records referencing meetings, schedules, and interstate and foreign travel to sell or acquire firearms.
- e. Stored communications, including text messages, MMS messages, and voicemails regarding the sale and purchase of firearms.
- f. Any subscriber or owner information for the cellular telephone.
- g. Any cellular telephone records, and telephone books or lists, or receipts relating to the sale, acquisition, purchase, or possession of firearms.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of devices or electronic storage (such as flash memory or other media that can store data) and any photographic form.

2. Evidence of user attribution showing who used or owned the SUBJECT DEVICE at the time the things described in this warrant occurred, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history.